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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jul 07, 2020

SEAN F. McAVOY, CLERK

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ALLEN LEE FULLERTON, and
15 JANELLE MARIE HUNTER,

16 Defendants.

2:20-CR-81-TOR

INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846
Conspiracy to Distribute 50
Grams or More of Actual
Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of
Methamphetamine
(Count 2)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Distribution of 50 Grams or
More of Actual
Methamphetamine
(Counts 3, 4, 5)

Forfeiture Allegations
21 U.S.C. § 853

1
2 The Grand Jury charges:

3 COUNT 1

4 Beginning on a date unknown, by on or about July 30, 2019, and continuing
5 until on or about September 23, 2019, in the Eastern District of Washington, and
6 elsewhere, the Defendants, ALLEN LEE FULLERTON and JANELLE MARIE
7 HUNTER, did knowingly and intentionally combine, conspire, confederate, and
8 agree together with each other and with other persons unknown, to commit the
9 following offense: distribution of 50 grams or more of actual methamphetamine, a
10 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
11 (b)(1)(A)(viii), all in violation of 21 U.S.C. § 846.
12

13 COUNT 2

14 On or about July 30, 2019, in the Eastern District of Washington, the
15 Defendants, ALLEN LEE FULLERTON and JANELLE MARIE HUNTER, did
16 knowingly and intentionally distribute methamphetamine, a Schedule II controlled
17 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.
18

19 COUNT 3

20 On or about August 7, 2019, in the Eastern District of Washington, the
21 Defendants, ALLEN LEE FULLERTON and JANELLE MARIE HUNTER, did
22 knowingly and intentionally distribute 50 grams or more of actual
23 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
24 § 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C. § 2.

25 COUNT 4

26 On or about August 27, 2019, in the Eastern District of Washington, the
27 Defendants, ALLEN LEE FULLERTON and JANELLE MARIE HUNTER, did
28 knowingly and intentionally distribute 50 grams or more of actual

1 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §
2 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C. § 2.

3 COUNT 5

4 On or about September 23, 2019, in the Eastern District of Washington, the
5 Defendants, ALLEN LEE FULLERTON and JANELLE MARIE HUNTER, did
6 knowingly and intentionally distribute 50 grams or more of actual
7 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
8 § 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C. § 2.

9 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

10 The allegations contained in this Indictment are hereby re-alleged and
11 incorporated by reference for the purpose of alleging forfeitures.

12 Pursuant to 21 U.S.C. § 853, upon conviction of any offense in violation of
13 21 U.S.C. § 841, as set forth in this Indictment, the Defendants, ALLEN LEE
14 FULLERTON and JANELLE MARIE HUNTER, shall forfeit to the United States
15 of America, any property constituting, or derived from, any proceeds obtained,
16 directly or indirectly, as the result of such offenses and any property used or
17 intended to be used, in any manner or part, to commit or to facilitate the
18 commission of the offenses.

19 If any of the property described above, as a result of any act or omission of
20 the Defendants:

- 21
- 22 a. cannot be located upon the exercise of due diligence;
 - 23 b. has been transferred or sold to, or deposited with, a third party;
 - 24 c. has been placed beyond the jurisdiction of the court;
 - 25 d. has been substantially diminished in value; or
 - 26 e. has been commingled with other property which cannot be divided
 - 27 without difficulty,
 - 28

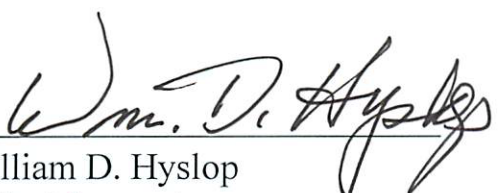
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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

3 DATED this 7 day of July 2020.

5 A TR

7
8 Foreperson

9 
10 William D. Hyslop
11 United States Attorney

12 
13 Timothy J. Ohms
14 Assistant United States Attorney